IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

HAYNES INTERNATIONAL, INC., a Delaware corporation,)	
Plaintiff,)	Civil Action No. 04-197(E)
v.)	JURY TRIAL DEMANDED
ELECTRALLOY, a Division of G.O. CARLSON, INC.,)	Judge Cohill
a Pennsylvania corporation,)	Juage Comm
Defendant.)	

PLAINTIFF'S MOTION FOR LEAVE TO FILE DOCUMENTS UNDER SEAL

Plaintiff, Haynes International, Inc. ("Haynes"), by and through its undersigned counsel, hereby files this Motion for Leave to File Documents Under Seal. In support of its Motion, Haynes avers as follows.

Haynes is filing a Motion for Partial Summary Judgment today, accompanied by a supporting brief and exhibits. The supporting brief and certain of the exhibits need to be filed under seal. Haynes' brief includes portions of deposition testimony provided by witnesses produced by Defendant. Haynes is attaching pertinent portions of the deposition transcripts as exhibits to its Motion for Partial Summary Judgment. Defendant has designated the entire deposition transcript of each witness produced by Defendant as confidential.

Additionally, other documents produced by Defendant and designated as confidential are attached as exhibits to Haynes' brief. Thus, both Haynes' brief and certain exhibits are required to be filed under seal. Haynes is filing its Motion for Partial Summary Judgment and non-confidential exhibits electronically with the Court.

Accordingly, Haynes hereby moves this Court for an Order granting leave for Haynes to file the above-identified documents (brief and certain exhibits) under seal. An appropriate form of Order is attached.

Respectfully submitted,

BUCHANAN INGERSOLL PC

Dated: September 27, 2005 By: /s/ Bryan H. Opalko

Lynn J. Alstadt Pa. I.D. No. 23487 Bryan H. Opalko Pa. I.D. No. 86721

BUCHANAN INGERSOLL PC 301 Grant Street, 20th Floor Pittsburgh, PA 15219-1410

Phone: 412-562-1632 Fax: 412-562-1041 Attorneys for Plaintiff

CERTIFICATE OF SERVICE

The undersigned certifies that on this 27th day of September, 2005, a true and correct copy of the foregoing PLAINTIFF'S MOTION FOR LEAVE TO FILE DOCUMENTS UNDER SEAL was served on the attorneys for Defendant by first class mail, postage prepaid, addressed as follows:

Timothy D. Pecsenye, Esquire Emily Barnhart, Esquire Jennifer L. Miller, Esquire BLANK ROME LLP One Logan Square 18th and Cherry Streets Philadelphia, PA 19103

> /s/ Bryan H. Opalko Bryan H. Opalko